

EXHIBIT O

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

HITUL GANDHI, Individually,)	
and on behalf of a class)	
of others similarly situated,)	
)	
Plaintiff,)	
v.)	Case No.
)	1:08cv-00248-SS
DELL INC.,)	
and)	
DELL MARKETING USA L.P.,)	
)	
Defendants.)	
)	

DEPOSITION OF

TRACIE WEBB

Taken on Behalf of the Defendants

November 3, 2007

VOWELL & JENNINGS, INC.
Court Reporting Services
207 Washington Square Building

214 Second Avenue North
Nashville, Tennessee 37201

(615) 256-1935

1 that nature.

2 Q. But after your marriage, this was the
3 first time when you went to back to work?

4 A. Uh-huh.

5 Q. Is that a yes?

6 A. Yes. I'm sorry.

7 Q. And did you see an ad in the paper that
8 you submitted a resume to, or how did you -- what
9 called your attention to Dell; do you know?

10 A. I posted my resume online on
11 monster.com.

12 Q. And somebody contacted you?

13 A. Right.

14 Q. What positions did you hold while you
15 worked at Dell?

16 A. I worked in small and medium business
17 -- I think it's called HSB now -- as a systems
18 representative. And then I was a technical
19 services representative, which is a server and
20 storage specialist.

21 Q. A what? A server and --

22 A. Server and storage specialist. And
23 then I was a software and peripherals specialist.

24 Q. We have heard some people use terms
25 "transactional" and "relationship sales." Are

1 Q. Okay. And did you have any way, under
2 personal knowledge, of how they operated at those
3 particular sites?

4 A. One of my coworkers as a systems
5 representative moved to Oklahoma City as a server
6 and storage representative, and he said it was
7 pretty much the same as in Nashville.

8 Q. And who was that?

9 A. Robert Hammond.

10 Q. How did you keep your time once you
11 started work as a Dell-badged employee?

12 A. We were told to enter it in Kronos
13 if we remembered, and then our manager would
14 double-check it when the time period -- or the
15 work period ended to make sure that it had been
16 entered most of the time. Sometimes the managers
17 forgot as well.

18 Q. And as I understand, Kronos is really
19 like a computer application; is that right?

20 A. Yes.

21 Q. Let me show you what has been -- we
22 marked earlier this morning as Deposition Exhibit
23 2, and it has on the front of it "Kronos." And is
24 that the way Kronos is spelled, the time-keeping
25 program that you were talking about?

1 A. When I was first moved as Dell badged,
2 I was SR1B.

3 Q. Okay. And that's just a grade level?
4 Is that what that means?

5 A. Yes.

6 Q. And then what do you move to after
7 that?

8 A. Then SR1, SR2. And when I left, I was
9 SR3.

10 Q. So it's just 1B is the lowest. 1, 2,
11 and 3 is -- is that the top?

12 A. No, there's more, but that's as far as
13 I went.

14 Q. As far as you got. And then it says
15 base pay, biweekly paycheck, and that's how often
16 you were paid, right, is biweekly?

17 A. Every two weeks.

18 Q. Right. And then it has 80 percent,
19 incentive pay 20 percent. And then the bottom
20 slide says base pay 60 and 40. Was that -- do you
21 know -- have you heard numbers like 80/20 and
22 60/40 as it refers to compensation?

23 A. I've heard those numbers, but I don't
24 know -- I didn't know what they meant.

25 Q. Did you hear that you would have a